

U.S. Department of Justice

United States Attorney Eastern District of New York

JAM/LHE F. #2018R00779

271 Cadman Plaza East Brooklyn, New York 11201

January 3, 2020

By Hand Delivery and ECF

Scott A. Resnik, Esq. Michael M. Rosensaft, Esq. Katten Muchin Rosenman, LLP 575 Madison Avenue New York, New York 10022

Re: United States v. Michael Cohn

Criminal Docket No. 19-097 (S-1) (JFB)

Dear Messrs. Resnik and Rosensaft:

Enclosed please find the government's sixth discovery production in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This production supplements the productions previously made to you on October 23, 2019, November 6, 2019, November 20, 2019, December 2, 2019 and December 11, 2019. The government reiterates its request for reciprocal discovery under Rule 16.

Enclosed herein is a copy of emails and other digital materials collected during a search of the offices of GPB Capital, which was executed pursuant to search warrant on or about February 27, 2019. These documents have been Bates numbered COHN-GPBSW-000000001 – COHN-GPBSW-000565184. As described to you during our previous discussions, this production includes documents that hit on search terms designed to seek documents relevant to the investigation described in that warrant and restricted to documents dated on or after August 1, 2018. The government will make available, upon request, unprocessed digital images of the various devices seized in connection with the execution of the warrant.

Also enclosed herein is a production of documents received from GPB Capital, which have been Bates numbered GPBCH-COHN 0002165 – GPBCH-COHN 0041727.

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact me.

Very truly yours,

RICHARD P. DONOGHUE United States Attorney

By: /s/ Lauren Howard Elbert

Lauren Howard Elbert Artie McConnell

Assistant U.S. Attorneys

(718) 254-7000

Enclosures

cc: Clerk of the Court (JFB) (by ECF) (without enclosures)